

EXHIBIT 2

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5)
6) Civil Action No.
7) 5:16-cv-10444-JEL-MKM
8 In re: FLINT WATER CASES) (consolidated)
9)
10) Hon. Judith E. Levy
11) Mag. Mona K. Majzoub
12)
13)

14 HIGHLY CONFIDENTIAL
15 CONTINUED REMOTE VIDEOTAPED DEPOSITION OF
16 WILLIAM FAHEY
17
18
19
20
21
22

23 Tuesday, October 27, 2020

24 VOLUME III

Continued remote videotaped deposition of
WILLIAM FAHEY, conducted at the location of the
witness in Boston, Massachusetts, commencing at
10:03 a.m., on the above date, before Carol A. Kirk,
Registered Merit Reporter, Certified Shorthand
Reporter, and Notary Public.

GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 A. I was a participant on the
2 go/no-go, yes, and I said, "Go."

3 Q. Okay. So if Veolia could do it
4 all again, you had a chance to do this work for
5 the City of Flint again, is there anything at
6 all that Veolia would do differently?

7 MR. MCELVAINE: Objection.

8 Mr. Connors, are you getting to a
9 document that was produced subsequent to
10 Mr. Fahey's original deposition, sir?

11 MR. CONNORS: Of course I am.

12 BY MR. CONNORS:

13 Q. Mr. Fahey, can you answer the
14 question?

15 MR. MCELVAINE: Okay. Get there
16 sooner rather than later.

17 Mr. Fahey, you can answer.

18 A. Based on what I've learned on all
19 this, I would have been a no go on doing
20 business with the City of Flint.

21 Q. Okay. And in terms of once you
22 agreed to perform this work for the city and
23 you're under contract with them to be their
24 water quality consultant, is there anything that

1 Veolia would have done differently if they had a
2 chance to do it again?

3 MR. MCELVAINE: Objection.

4 You can answer, Mr. Fahey.

5 A. I believe our report was a good
6 report. We made sound recommendations. The
7 fact that the regret we have is that we can't
8 force cities and towns to implement
9 recommendations. So they should have listened.

10 Q. Okay. So I hear you casting blame
11 on the city.

12 Is there anything at all Veolia
13 would have done differently? And if the answer
14 is no, that's fine. I'm just asking.

15 MR. MCELVAINE: Objection.

16 You can answer.

17 A. I mean, I think we did a good job
18 for the city, so no. We did our job.

19 Q. Okay.

20 - - -

21 (Fahey Deposition Exhibit 40 marked.)

22 - - -

23 BY MR. CONNORS:

24 Q. Exhibit 40 is Bates-labeled

CERTIFICATION

I, Carol A. Kirk, Registered Merit Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, WILLIAM FAHEY was duly remotely sworn by me to testify to the truth, the whole truth, and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place, and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor an employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



Carol A. Kirk, RMR, CSR

Notary Public

Dated: November 10, 2020